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May 22, 2025

**VIA ECF ONLY**

Hon. Sanket J. Bulsara, U.S. District Judge  
Hon. Vera M. Scanlon, Chief Magistrate Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Chambers 304N, Courtroom 324N  
Brooklyn, New York 11201

**Re: *Allstate Ins. Co., et al. v. Rybak, et al.*, E.D.N.Y. Case No. 22-cv-4441(SJB)(VMS)**  
**Related Cases: 1:25-mc-01838 (SJB)(VMS)**  
**1:25-mc-01674(SJB)(VMS)**  
**2:25-mc-01865(SJB)(VMS)**

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Dear Hon. Bulsara and Scanlon:

Along with Cadwalader Wickersham & Taft, we represent Plaintiffs in the above referenced matter. We write this letter jointly with counsel for the sole remaining litigating Defendant in this action, Defendant Oleg Rybak (“O. Rybak”),<sup>1</sup> to advise the Court that, pursuant to continued discussions following the mediation on April 25, 2025, the parties have reached an agreement in principle to resolve the matter.

Accordingly, we respectfully request that the Court permit the parties forty-five (45) days, to Monday, July 7, 2025, to finalized the settlement and that all pending motions (including, in the related

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<sup>1</sup> O. Rybak is represented by Mark Arthur Berman of Bond, Schoeneck & King PLLC, and Matthew J. Conroy, Esq. and Robert E.B. Hewitt III, Esq. of Schwartz Conroy & Hack, P.C.



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cases, 1:25-mc-01838 (SJB)(VMS) ECF Nos. 1-3, 1:25-mc-01674(SJB)(VMS) ECF Nos. 1-3 and 2:25-mc-01865(SJB)(VMS), ECF Nos. 1-3) be held in abeyance while the parties proceed with drafting, exchanging comments and finalizing the settlement agreement. Upon the anticipated completion of the settlement, Plaintiffs will promptly file a stipulation of dismissal with respect to Defendant O. Rybak. In the unforeseen event that the parties do not conclude the settlement, they respectfully request that the current discovery deadlines be tolled and extended for the requested 45-day period.

We thank the Court for its consideration in this regard.

Very truly yours,

**MANNING | KASS**

A handwritten signature in black ink, appearing to read 'Erica L. Mobley'.

Erica L. Mobley, Esq.

ELM